

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

MANUFACTURERS AND TRADERS TRUST
COMPANY d/b/a M&T BANK,

Defendant.

Civil Action No. 1:16-cv-03180-ELH

DECLARATION OF CANDACE MCCOLLIN

I, Candace McCollin, do depose and state as follows:

1. I am an adult over the age of 18 years, and make the following statements based upon my personal knowledge.

2. I am currently employed as an Assistant Branch Manager for the State Employees' Credit Union (SECU) in Nottingham, MD. I was hired by SECU in March 2014 after Defendant M&T Bank terminated my employment in September 2013.

3. At the time of my termination, I had 12 years of retail banking, including sales, experience. I began my career in retail banking as a bank teller for AllFirst Bank in 2001, approximately three years after my high school graduation. In 2002, Provident Bank hired me as a relationship banker. While at Provident, I received several promotions, including to assistant branch manager in 2004, and branch manager in 2007. In 2009, Defendant M&T Bank acquired Provident Bank. After the acquisition, I worked as the branch manager of Defendant's

Mondawmin Mall Shoppers branch. In 2012, Defendant permanently closed the Mondawmin Mall Shoppers branch, and selected me to become the branch manager of its Edmonson Village branch.

4. As a Branch Manager, I was responsible for the overall profitability of my branch; operations and compliance, including branch audits; performance management, including employee coaching, development and engagement; and sales and business development.

5. I gave birth to my first child in 1998 without major complications. In 1999, my OB-GYN, Dr. Murray Pearlman, discovered abnormal cells in my cervix during a routine pap smear. He performed a loop electrosurgical excision procedure (LEEP) to remove the cells. Although I became pregnant in 1999, I suffered a miscarriage during my first trimester. In 2008, I became pregnant again and suffered a miscarriage during my second trimester. Dr. Pearlman subsequently diagnosed me with an incompetent cervix. In 2010, I again became pregnant. Based on my history of miscarriages, Dr. Pearlman performed a vaginal cerclage to prevent my cervix from opening prematurely during my pregnancy. The cerclage he performed ultimately failed and I miscarried again during my second trimester.

6. In 2012, while working as branch manager for Edmonson Village, I learned I was pregnant. After I informed Dr. Pearlman of my pregnancy, he referred me to Dr. Stephen Contag, an OB-GYN, to perform a transabdominal cervical cerclage. I was told that the abdominal cerclage is more effective than the vaginal cerclage for preventing spontaneous dilation of the cervix. After performing the surgery in December 2012, Dr. Contag ordered me to remain on bedrest. He further informed me that at around 24 weeks gestation, he would determine if I could return to work at a date earlier than my July 2013 scheduled delivery date. Per his instructions, I took an extended leave of absence beginning in December 2012.

7. In or around March 2013, I informed my supervisor, Anne Bartolotta, that I would be unable to return to work until the birth of my baby in July 2013.

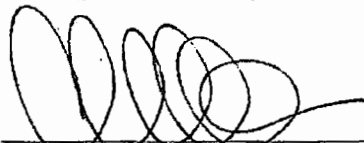
8. On June 10, 2013, I successfully delivered my baby by cesarean section. On August 5, 2013, Dr. Sonia Zaft, one of Dr. Pearlman's OB-GYN partners, released me to return to work without any restrictions.

I declare the foregoing is true under penalty of perjury.

Executed on

4-25-18

Date



Candace McCollin